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27 **UNITED STATES DISTRICT COURT**

28 **DISTRICT OF NEVADA**

17 ROCKETFUEL BLOCKCHAIN, INC., a
18 Nevada corporation; and ROCKETFUEL
19 BLOCKCHAIN COMPANY, a Nevada
20 Corporation,

21 Plaintiffs,
22 vs.
23 JOSEPH PAGE, an individual; AND DOES
24 1 THROUGH 10, INCLUSIVE,
25 Defendant.

26 Case No.: 2:21-cv-00103-KJD-EJY

27 **[PROPOSED] STIPULATION AND
28 ORDER TO EXTEND DEADLINE TO
FILE JOINT PROPOSED PRETRIAL
ORDER**

[FIRST REQUEST]

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1 JOSEPH PAGE, an individual,

2 Counterclaimant,

3 vs.

4 ROCKETFUEL BLOCKCHAIN, INC., a
5 Nevada corporation; and ROCKETFUEL
6 BLOCKCHAIN COMPANY, a Nevada
7 Corporation, *et al.*,

8 Counterdefendants.

9 Pursuant to LR 26-3 and LR IA 6-1, Plaintiffs Rocketfuel Blockchain, Inc. and Rocketfuel
10 Blockchain Company (“Plaintiffs”), by and through their counsel, and Defendant Joseph Page
11 (“Defendant”) hereby submit the following stipulation to extend deadline to file Joint Proposed
12 Pretrial Order, which is supported by good cause.

13 • Plaintiffs and Defendant (hereinafter the “Parties”) hereby agree to extend the
14 deadline for filing a Joint Proposed Pretrial Order by seven (7) days, as more specifically
15 addressed in Section D below. The Parties jointly request that this Court enter the attached Order
16 implementing the modified schedule.

17 • This Court initially ordered that a bench trial in this matter would commence on
18 May 2, 2022, and that the parties’ deadline to file a Joint Pretrial Order would be April 22, 2022,
19 (ECF No. 112).

20 • On Plaintiffs’ Motion, this Court subsequently ordered that trial be continued until
21 June 6, 2022, (ECF No. 121).

22 • Plaintiffs provided Defendant a draft Joint Proposed Pretrial Order on Tuesday,
23 April 19, 2022. Defendant responded on April 22, 2022, requesting a phone conference to discuss
24 the parties’ trial exhibits, and breaking the same down to account for exhibits within exhibits.
25 Counsel for Plaintiffs and Defendant have scheduling conflicts that preclude this discussion from
26 taking place prior to the current April 22, 2022, deadline.

27 • Given the foregoing, the Parties request an additional seven (7) days to thoroughly
28 review and finalize the draft Joint Pretrial Order (including exhibits and witness lists), discuss

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1 stipulations, and hold a meaningful meet-and-confer to ensure the Joint Pretrial Order is
2 satisfactory to both Parties prior to filing.

3 • This is the first extension of time requested. This stipulation is made in good faith
4 and not in an attempt to delay proceedings.

5 • Consistent with LR 26-3, the Parties represent the following:

6 a. **Discovery Completed.** The Parties have completed all discovery in this matter,
7 with the Joint Proposed Pretrial Order being the only remaining discovery deadline.

8 b. **Discovery that Remains to be Completed.** The Joint Proposed Pretrial Order is
9 the only remaining discovery to complete.

10 c. **Reasons why the Remaining Discovery was Not Completed.** The parties have
11 exchanged draft Joint Pretrial Orders and, as discussed above, need additional time to conduct a
12 meaningful meet-and-confer to finalize the draft before filing. The Parties are unable to meet-
13 and-confer prior to the current April 22, 2022, deadline because Plaintiffs' counsel's attendance
14 at an all-day mediation in an unrelated matter. To ensure the Joint Pretrial Order accurately and
15 comprehensively identifies the exhibits, and in a manner that will promote efficiency during trial,
16 the Parties respectfully ask this Court to permit an additional seven (7) days to file the same.

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d. Proposed Schedule for Completing All Remaining Discovery. Given the foregoing, the Parties request the following schedule pertaining to the discovery deadlines that remain:

i. Joint Pretrial Order. The Parties propose the Joint Pretrial Order shall be filed on or before Friday, April 29, 2022.

Respectfully submitted,

DATED this 22nd day of April 2022.

DATED this 22nd day of April 2022.

For Plaintiffs

KEMP JONES, LLP

For Defendant

/s/ Chad R. Aronson

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/s/ Joseph Page

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Council for Traumatis

IT IS SO ORDERED

IT IS SO ORDERED.

Eayna J. Zouchah
UNITED STATES MAGISTRATE JUDGE

April 22, 2022